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11 Attorneys for Defendants, DARRICK ANGELONE, AONE CREATIVE, LLC
12 and ON CHAIN INNOVATIONS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

11 HIDDEN EMPIRE HOLDINGS, LLC;
12 a Delaware limited liability company;
13 HYPER ENGINE, LLC; a California
limited liability company; DEON
TAYLOR, an individual.

Case No. 2:22-cv-06515-MWF-AGR
Action Filed: September 12, 2022

**DECLARATION OF
SANDRA CALIN REGARDING
REQUEST FOR SUBSTITUTION
OF ATTORNEY**

14 Plaintiffs,
15 v.
16 DARRICK ANGELONE, an
17 individual; AONE CREATIVE, LLC
18 formerly known as AONE
ENTERTAINMENT LLC, a Florida
limited liability company; ON CHAIN
INNOVATIONS, LLC, a Florida
limited liability company.

Defendants.

I, Sandra Calin, declare as follows:

23 1. I am an attorney at law duly licensed to practice before all courts of the
24 State of California and am a partner with the law firm of Kramer, deBoer & Keane,
25 LLP, attorneys of record for Defendants DARRICK ANGELONE, AONE
26 CREATIVE, LLC and ON CHAIN INNOVATIONS, LLC (“Defendants”) in the
27 above-captioned case.

1 2. I have personal knowledge of the following facts and, if called upon as
2 a witness, could competently testify thereto, except as to those matters which are
3 explicitly set forth as based upon my information and belief and, as to such matters, I
4 am informed and believe that they are true and correct.

5 3. The purpose of this Declaration is to bring to the Court's attention a
6 document filed in this case on March 15, 2023, a Declaration of Quincy Newell,
7 Document 61-2, and attached hereto as Exhibit "A."

8 4. In this Declaration, Mr. Newell indicates that he has "served as a
9 consultant" [p.2, line 2] to Plaintiffs and his duties include "a chief operations officer"
10 [p.2, line4].

11 5. Defendants intend to depose Quincy Newell in this case.

12 6. Declarant is informed and believes that Quincy Newell is a partner in
13 Newell Law Group, counsel requesting to substitute into the case. Defendants are
14 concerned that by this Substitution, they will be unable to depose Quincy Newell, who
15 is an essential witness in the case.

16 7. Declarant respectfully requests that if the Substitution is granted, the
17 Court will allow a deposition of Quincy Newell to go forward in the case, following
18 the completion of written discovery.

19 I certify under penalty of perjury that the foregoing is true and correct.

20 Executed this 13th day of September, 2024, at Woodland Hills, California.

KRAMER, DEBOER & KEANE
A LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS
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23 SANDRA CALIN, Declarant
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EXHIBIT “A”

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2 Stephanie Jones Nojima (178453)
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7 Attorneys for Plaintiffs
HIDDEN EMPIRE HOLDINGS, LLC;
8 HYPER ENGINE, LLC; AND DEON
TAYLOR

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

HIDDEN EMPIRE HOLDINGS, LLC;
a Delaware limited liability company;
HYPER ENGINE, LLC; a Delaware
limited liability company; DEON
TAYLOR, an individual.

16 Plaintiffs.

17 || v.

18 DARRICK ANGELONE, an individual;
19 AOne CREATIVE, formerly known as
AOne ENTERTAINMENT LLC, a
Florida limited liability company; ON
20 CHAIN INNOVATIONS, LLC, a
Florida limited liability company,

Defendants.

CASE NO. 2:22-cv-06525-MFW-AGR

**DECLARATION OF QUINCY
NEWELL IN SUPPORT OF
PLAINTIFFS' *EX PARTE*
APPLICATION FOR PROTECTIVE
ORDER**

1 I, Quincy Newell, declare as follows:

2 1. I have served as a consultant for Hidden Empire Holdings, LLC.
3 (“HEFG”) since March 2021. My consulting duties at HEFG have been in the capacity
4 of a chief operations officer, which include guiding the development of long-term
5 business strategies, providing advisement concerning daily operations of the
6 company, working with the owners to develop a strategy to scale HEFG’s business,
7 and provide strategic advisement regarding the company’s fundraising activities. I am
8 also the founder of TwentyOne 14, LLC, a media company that focuses on providing
9 strategic advisement to media and entertainment companies and content development
10 and production targeted to multi-cultural audiences.

11 2. The facts set forth in this declaration are based on my personal
12 knowledge, except where otherwise noted, and, if called to testify, I could and would
13 competently testify thereto.

14 3. In or around April of 2021 I engaged an outside consultant, Philip Fier
15 to provide financial modeling services for HEFG’s fundraising efforts. I was Mr.
16 Fier’s sole point of contact with HEFG for this engagement and there was no
17 interaction between Mr. Fier and Defendant Darrick Angelone (“Angelone”) or
18 anyone else affiliated with Defendant AOne Creative, LLC (“AOne”) during the
19 course of this engagement. Nor was Angelone or anyone affiliated with AOne ever
20 copied on emails between Mr. Fier and me, which I sent from or received in my
21 quincy@hiddenempirefilmgroup.com HEFG email account. Neither I or anyone else
22 at HEFG ever authorized Angelone to read through emails sent to or from my
23 quincy@hiddenempirefilmgroup.com email account.

24 4. I understand that Defendants in this action have already or are attempting
25 to serve a subpoena for the production of business records on Mr. Fier seeking the
26 production of documents relating to the work Mr. Fier performed for HEFG. The only
27 way Defendants could have learned of the engagement between Mr. Fier and HEFG
28 was by Angelone abusing his privileges as the administrator of HEFG’s email system

1 by reading through the confidential emails sent to or from my
2 quincy@hiddenempirefilmgroup.com email account.

3 5. Defendants are also attempting to serve a subpoena on my company,
4 TwentyOne 14, LLC. TwentyOne 14, LLC's sole relationship with HEFG is the
5 lending of my consulting services, the company has no further engagement with
6 HEFG other than my consulting services. Other than my consulting time spent with
7 HEFG, TwentyOne 14 as a company has no further business with HEFG and has
8 nothing to do with the claims asserted by Defendants in this action. All
9 correspondence during my consultancy has taken place on HEFG owned and
10 controlled emails accounts and servers and all documentation that may be relevant to
11 this matter produced during my consultancy exists on HEFG company document
12 storage servers. This protocol has been the requirement during my consultancy, and
13 for other consultants engaged with HEFG, to ensure that all rights and proceeds
14 derived from my time with HEFG, remain HEFG's property and under HEFG's
15 control. I believe the basis for Defendants' subpoena to TwentyOne 14, LLC is not to
16 seek information potentially relevant to this action, but rather to personally harass and
17 annoy me as a result of my consulting role at HEFG.

18 I declare under the penalty of perjury under the laws of the State of California
19 that the foregoing is true and correct.

20 Executed on March 15, 2023 at Los Angeles, California

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22 /s/ Quincy Newell
23 Quincy Newell
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CERTIFICATE OF SERVICE

I am employed in Los Angeles County, California. I am over the age of 18 and not a party to this action; my business address is 21860 Burbank Blvd., Suite 370, Woodland Hills, CA 91367. My email address is ynelson@kdeklaw.com.

I certify that on September 13, 2024, I served: **DECLARATION OF
SANDRA CALIN REGARDING REQUEST FOR SUBSTITUTION OF
ATTORNEY** on the following parties or counsel of record as follows:

<p>LAWRENCE HINKLE (SBN 180551) STEPHANIE JONES NOJIMA (SBN 178453) JOSHUA ROY ENGEL SANDERS ROBERTS LLP 1055 West 7th Street, Suite 3200 Los Angeles, CA 90017 Telephone: (213) 426-5000 - Facsimile: (213) 234-4581</p>	<p><i>Counsel for Plaintiffs</i></p>
<p>E-Mail: lhinkle@sandersroberts.com; sjonesnojima@sandersroberts.com; jengel@sandersroberts.com;</p> <p>Felton T. Newell, Esq. Newell Law Group PC 1801 Century Park East, 24th Floor Phone (310) 556-9663 E-mail: felton@newellpc.com</p>	
<p>Justin Kian, Esq. J.T. Fox, Esq. LAW OFFICES OF JT FOX, APC 556 S. Fair Oaks Avenue, Suite 444 Pasadena, California 91105 Telephone: (888) 750-5530 Fax: (888) 750-5530 Email: jt@jtfoxlaw.com; justin@jtfoxlaw.com</p>	<p><i>Co-Counsel for Defendants</i></p>

1 By ECF/CM: I electronically filed an accurate copy using the Court's Electronic
2 Court Filing ("ECF") System and service was completed by electronic means by
3 transmittal of a Notice of Electronic Filing on the registered participants of the ECF
4 System.

5 I declare under penalty of perjury under the laws of the United States of
6 America and the State of California that the foregoing is true and correct. Executed
7 at Woodland Hills, California on September 13, 2024.

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10 Yolanda Nelson

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